

# REGIONAL TRANSIT ISSUE PAPER

Agenda Item No.	Board Meeting Date	Open/Closed Session	Information/Action Item	Issue Date
11	11/18/19	Open	Action	10/31/19

Subject: Approval of a Records Retention Policy

## ISSUE

Whether or not to adopt a Records Retention Policy for the Sacramento Regional Transit District.

## RECOMMENDED ACTION

Adopt Resolution No. 19-11-\_\_\_\_, Approving a Records Retention Policy.

## FISCAL IMPACT

None as a result of this action.

## DISCUSSION

Records Retention policies apply to all records, whether they are maintained in hard (paper) copy, electronically, or in some other format. To ensure districtwide compliance with the policy, each Vice President or Assistant Vice President, at SacRT, depending on the reporting structure in the division or department, will assign a coordinator within their department/division who will be responsible for implementation of the records retention policy appropriate for the particular records it maintains, in cooperation with the Office of the Clerk to the Board and General Counsel. The General Counsel will maintain the retention schedule and will make additions, deletions and updates as needed.

Staff requests that the Board adopt the Records Retention Policy as depicted in Exhibit A to the Resolution.

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Approved:

Presented:

Final 11/13/19

General Manager/CEO

Shelly Valenton, VP, Integrated Services and Strategic Initiatives

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RESOLUTION NO. 19-11-\_\_\_\_\_

Adopted by the Board of Directors of the Sacramento Regional Transit District on this date:

November 18, 2019

**APPROVING A RECORDS RETENTION POLICY**

BE IT HEREBY RESOLVED BY THE BOARD OF DIRECTORS OF THE SACRAMENTO REGIONAL TRANSIT DISTRICT AS FOLLOWS:

THAT, the Board of Directors hereby approves the Records Retention Policy attached hereto as Exhibit A.

\_\_\_\_\_  
PATRICK KENNEDY, Chair

A T T E S T:

HENRY LI, Secretary

By: \_\_\_\_\_  
Cindy Brooks, Assistant Secretary



**Regional  
Transit**

**SACRAMENTO REGIONAL TRANSIT DISTRICT  
RECORD RETENTION AND DISPOSITION POLICY**

**November 18, 2019**

- I. POLICY STATEMENT**
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## **I. POLICY STATEMENT**

Under the California Public Records Act (CPRA), the Sacramento Regional Transit District (SacRT) is required to make its public records available for public disclosure, unless there is a specific reason not to do so. The reasons for withholding disclosure of a record are set forth in the exemptions contained in the CPRA. SacRT is authorized to develop the procedures to be followed when making its public records available to the public. Further, SacRT is also authorized to determine any significant record in its possession that is no longer of any value to SacRT and that may be disposed of in accordance with the Records Retention and Destruction Schedule.

## **II. PURPOSE**

The purpose of this Policy is to establish the record retention policies, procedures, and guidelines for use in the retention and disposition of SacRT's records in compliance with state and federal law and in accordance with each document's administrative, legal, fiscal, and historical value. This policy also sets forth SacRT's procedures for providing its records to the public pursuant to the CPRA.

The Board of Directors authorizes the General Manager/CEO to interpret and implement this policy and to cause to be destroyed any and all records, papers, and documents that meet the specifications of this policy.

## **III. APPLICATION**

This policy applies to all SacRT Board Members, SacRT regular or temporary employees, consultants, contractors, vendors, agents, affiliates, and any other entities directly engaged in SacRT business that are responsible for the creation, management, and storage of SacRT records.

## **IV. AUTHORITY**

California Public Records Act (PRA) (Gov. Code Section 6250) which was passed by the Legislature in 1968, as amended by Section 14740 in 1999, is modeled after the federal Freedom of Information Act and details what government information is, and is not available to the public. In general, all records are open to the public except 28 specific exemption categories listed in PRA Section 6254. The PRA applies to all records, in whatever form, maintained by either state or local public agencies.

## **V. DEFINITIONS**

To help provide guidance to those subject to this policy and for ease of administration of this policy, the following terms have the following meanings:

**Active Records** - A record that will be used for ongoing daily, weekly, monthly, semi-annual, or annual purposes. Active records are usually those records referred to at least once per month.

**Administrative Records** – Records commonly found in all offices and typically retained for fewer than five years.

**Administrative Value** – Records created to help accomplish the day-to-day functions of all offices, and that are needed only as long as they assist SacRT in performing current or future work.

**Appraisal** – The process of determining the need to retain or dispose of records.

**Convenience File** – Extra copies of records, personal papers, or publications maintained for ease of access and reference, also known as a personal file.

**Copy** – A reproduction of the contents of an original document prepared simultaneously or separately, usually identified by function or by method of creation. Copies identified by function may include action, copy, comeback copy, file or record copy, information or reference copy official copy, and tickler copy.

**Correspondence** – Letters, postcards, memoranda, notes, telecommunications, emails, and any other form of addressed, written communications sent or received.

**Current records** – A record that is in force even though there is no activity or ongoing process directly related to it. Policies, procedures, standards, guidelines and organizational charts (the record copy or original with the background material) would be “current” until revised, superseded, or rescinded.

**Discovery** – Pretrial disclosure or pertinent facts or documents by one or both parties to a civil or criminal action or proceeding. Nothing requested during discovery may be destroyed – even non-records and records that should have been destroyed earlier. Discovery effectively freezes selected holdings until released by SacRT’s General Counsel.

**Disposition** – The actions taken with regard to records following their appraisal. This also includes but is not synonymous with disposal.

**Document** – Recorded information regardless of the medium or physical characteristics. Frequently used interchangeably with “record.” See also “Records.”

**Electronic Records** – Those records in a form that only a computer can process and store. Databases and other data compilations that are used for multiple purposes are records. Computer back-up tapes and other duplicate computer files are non-records. Electronic mail, voice mail and word processing files are non-records when destroyed or, for word processing files, when they are

superseded by more recent versions or when they are printed. The final printed outputs are records. When computer information is characterized as a record material, it must be retained according to SacRT's records retention schedule.

**Expired Records** – On or off-site records whose retention period has passed.

**Fiscal Value** – Fiscal Records pertain to SacRT's financial transaction, such as budgets, ledgers, allotments, payrolls and vouchers. After some records have served a basic administrative function, they may still have sufficient fiscal value to justify additional retention.

**Historical Records** – Records that document the history and development of an agency or contain data that can be useful for research.

**Historical Value** – The determination by appraisal that historical records are worthy of permanent preservation.

**Legal Hold** - A notice issued by SacRT's General Counsel directing that documents must not be destroyed because the documents are subject to legal action (civil or criminal) or government investigation. A record subject to a "legal hold" cannot be destroyed even though the record's retention period may have expired.

**Legal Value** – Records with legal value containing evidence of legally enforceable rights or obligations of SacRT. Examples are records that provide the basis for action, such as agency decisions and legal opinions; fiscal documents representing agreements, such as leases, titles and contracts; and records of action in particular cases, such as claim documents and legal dockets.

**Local Government** – Includes a county; city, whether general law or chartered; city and county; school district; municipal corporation; district; political subdivision; or any board; commission or agency thereof; other local public agency; or nonprofit entities that are legislative bodies of a local agency pursuant to subdivisions (c) and (d) of Government Code Section 54952.

**Non-Records** – Material not usually included within the definition of records, such as unofficial copies of documents kept only for convenience or reference, working papers, appointment logs, stocks of publications, requests for printed material after the requests have been filled, transmittal letters and acknowledgments that do not contribute any information to the material transmitted, shorthand notes and dictating media that have been transcribed and miscellaneous notices of SacRT's affairs, meetings, holidays, etc. Also, documents such as rough notes, calculations or drafts used in the preparation or analysis of other documents.

**Obsolete** – means equipment or records that are inoperable, damaged beyond economical repair or no longer practical to use due to outdated technology.

**Permanent Records** – Records that are required in perpetuity, usually identified by statute or other written guidance.

**Perpetual Records** – A category of records in which the category is perpetual, but the records within the category may be stored or destroyed. Examples include office personnel files that are kept until a person leaves the office and is not vested in SacRT’s pension plan, policy files kept until the policy is changed and contract files kept until the contract terminates.

**Program Records** – Records that relate to SacRT’s primary function in response to its daily mission.

**Public Records** – Any writing containing information relating to the conduct of the public’s business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics.

**Records** – All papers, maps, exhibits, magnetic or paper tapes, photographic films and prints, electronic documents and other documents produced, received, owned or used by an agency, regardless of physical form or characteristics. Not all “records” are public records.

**Records Disposal** - Refers to the transfer of records, especially inactive records, to their final state, either disposal or transfer to an archive.

**Record Files** – Means all communications related to public business regardless of physical form or characteristics, including any writing, picture, sound or symbol, whether paper, magnetic or other media.

**Records Management** – Record creation, storage and destruction.

**Record Owner** – Refers to the department or division that is the subject matter expert on the content of the record and is responsible for the life cycle management of the record.

**Records Retention Schedule** – A document governing, on a continuing basis, the mandatory disposition of the records of an organization or agency. It lists all records produced or maintained by an agency and the actions taken with regard to those records. A retention schedule is an agency’s legal authority to receive, create, retain, and dispose of official public records. It assists the agency by documenting which records require office or temporary storage, have historic or research value, or should be destroyed because they no longer have administrative, fiscal, or legal value.

**Retention Period** – The length of time a record must be retained to fulfill its administrative, fiscal and/or legal function.

**Sensitive Documents/Records** – Are documents or data files solely intended for use by the authorized user? They include, but are not limited to, memoranda or

reports regarding internal departmental matters; investigations; working papers; preliminary drafts; informal comments and suggestions; financial information related to budget preparation and review; and other types of similar information.

**Significant Documents/Records** – Significant documents/records are organizational, policy, and procedural directives, reports, and recommendations and technical documentation related to programmatic activities; agendas and minutes of meetings sponsored by SacRT; legal and contractual documents; and correspondence regarding programmatic activities which the Department Head determines must be preserved and retained in the regular courses of SacRT business.

**Vital (Essential) Records** – Those records needed to perform an agency's mission or to reconstruct basic agency programs during and after a major disaster.

**Writing** – Is any handwritten, typewritten, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combination thereof, and any record thereby created, regardless of the manner in which the record has been stored.

## VI. POLICY

### A. RETENTION POLICY

Every organization, including SacRT, generates records and non-records, physical and electronic. A record holds operational, legal, fiscal, vital, or historical value. A non-record is information with no operational, legal, fiscal, vital, or historical value and does not constitute a public record. Non-records lack evidence of lasting value or official business activities. Non-records should be disposed of as soon as they are no longer of use.

SacRT will retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference, or to comply with contractual or legal requirements, or for other purposes set forth below. Documents and other materials that do constitute "records" under that section, including those described below in Category 4, may be destroyed when no longer needed, unless otherwise specified herein this part VI.

The Office of the General Counsel will maintain a Records Retention Schedule. SacRT's records will generally be classified for retention and destruction purposes as follows:

**Category 1: Permanent Retention.** Records that are permanent or essential will be retained and preserved indefinitely.



Permanent Records. These records are required by law to be permanently retained and are ineligible for destruction unless they are microfilmed or placed on an optical imaging system, and special measures are followed. Once these measures are followed, the original paper records may be destroyed. Duplicate copies of permanent records may be destroyed whenever they are no longer necessary for SacRT's efficient operation. Examples of permanent records include project files, Board files, internal and external audits, real property deeds, personnel hiring, and disciplinary records. Not every department/division will have permanent records.

Essential records. These are records that are necessary for the continuity of government and the protection of the rights and interests of individuals. Examples of essential records are: Fleet Engineering Records, Accident Records and Grant Awards and Modifications.

**Category 2: Current Records.** Records that are for convenience, ready reference or other reasons are retained in the office space and Department equipment. Current records will be retained as follows:

Where retention period is specified by law. Where federal, state, or local law prescribes a definite period of time for retaining certain records, SacRT will retain the records for that period specified by law. Examples of records required to be maintained for a specific period are Workers' Compensation Records, grievances and payroll records; e.g., Conflict of Interest Form 700 must be retained for 7 years pursuant to Gov. Code Section 81009(e); Accident-Injury reports must be retained for 5 years pursuant to 29 CFR 1404.6.

Where no retention period specified by law. Where no specific retention period is specified by law, the retention period for records that the department is required to retain will be specified in the Record Retention and Destruction Schedule. Records will be retained for a minimum of two years, although such records may be treated as "storage records" and placed in storage at any time during the applicable retention period. Examples of current records include: correspondence, schedules and administrative records.

**Category 3: Storage Records.** Storage records are records that are retained offsite and are subject to the same retention requirement as current records. Examples of storage records include citizen complaints, invoices, and payroll correction reports.

**Category 4: No Retention Required.** Documents and other materials that are not "records" need not be retained unless retention is otherwise required by local law or by the Record Retention and Destruction Schedule. Documents and other materials (including originals and duplicates) that are not otherwise required to be retained, are not necessary to the functioning or continuity of the department and that have no legal significance may be destroyed when no longer needed. Examples include materials and

documents generated for the convenience of the person/department that created them, draft documents (other than some contracts) that have been superseded by subsequent versions, or rendered moot by departmental action, and duplicate copies of records that are no longer needed. Specific examples include telephone message slips, miscellaneous correspondence not requiring follow-up or departmental action, notepads, e-mails that do not contain information required to be retained under this policy, and chronological files.

With limited exceptions, no specific retention requirements are assigned to documents in this category. Instead, it is up to the originator or recipient to determine when the documents' usefulness has ended.

## **B. PUBLIC RECORDS DISCLOSURE**

SacRT records that are not subject to being withheld for public disclosure will be open to public inspection during SacRT's regular business hours. Copies of SacRT's records that may be released must be obtained through a CPRA request submitted to SacRT's General Manager/CEO. In coordination with SacRT's General Counsel, the General Manager/CEO is solely responsible for releasing SacRT's records as they relate to CPRA requests. SacRT's departments and divisions may not disclose records or information and must direct all public or media requests for SacRT records to the General Manager/CEO. Failure to direct a public records request to the General Manager/CEO may result in delayed response as the time for a response will not start until the request is received by the General Manager/CEO. SacRT will retain any record that is the subject of a pending request made pursuant to the CPRA, whether or not SacRT maintains that the record is exempt from disclosure, until the request has been granted or two years have elapsed since SacRT provided written notice to the requestor that the request has been denied. (Government Code sec. 60201(d)(5))

Certain documents are subject to being withheld from disclosure because they fall within the definition of "Special Record Category" documents. They are as follows:

### **1.1.1 Special Record Categories**

SacRT has identified specific types of records that are considered to fall within the Special Records Category. Special Record Category records are subject to special care, handling and additional review as appropriate. Such records will only be released when authorized by the General Manager/CEO or his/her designee. Departments must follow these standards for the management of SacRT records covered under the Special Record Categories:

- a. The General Manager/CEO is responsible for the collection, storage, management and release of Special Record Category records;
- b. SacRT's General Counsel must review requests for Special Record Category Records; and
- c. No Board Members, SacRT employees, consultants, agents, contractors, vendors, affiliates, and any other entity directly engaged in SacRT business is authorized to release, disclose, provide, copy, transfer, attach as an email attachment, or otherwise deliver any Special Record Category records to anyone not authorized by SacRT to have access to these records.

The various types of documents that fall within the Special Records Categories are as follows:

#### **1.1.2 Security Sensitive Information**

Security Sensitive Information (SSI) and/or documents may not be disclosed to the extent that they may compromise the security of SacRT's systems' infrastructure, rolling stock, computer systems, or equipment that supports the operation of the transit system, and/or the equipment that supports the operation of the transit system, and/or the physical safety of passengers and/or employees. SSI records include any hard copy and/or electronic records generated by SacRT staff, its contractors, consultants, or other public entities. SSI may include any kind of design specifications or construction documents that relate to facilities, transportation systems, transit stations, vehicles, communications, security systems, vulnerability assessments, contingency plans, and other information covered under 49 CFR 1520.5(a) and California Government Code sec. 6254.

#### **1.1.3 Investigative Records**

Records of complaints to, or investigations conducted by, or for SacRT are investigative records. Such information may endanger the safety of a person involved in an investigation; may endanger the successful completion of an investigation; may identify confidential sources; or may reveal information supplied in confidence.

Investigative records include documents related, but not limited to, criminal investigations, worker's compensation investigations, internal administrative

investigations, third-party claims or compliant investigations, property damage investigations, bus and rail incident/accident investigations, and other similar types of investigations.

#### **1.1.4 Privileged Records**

Documents and records, or portions thereof, prepared by, at the direction of, or in conjunction with the General Counsel or outside legal counsel, including attorney-client communications, will be considered privileged or work product communications and may be redacted or withheld.

SacRT's General Counsel may release privileged records only in such cases as a court has determined that it is necessary for such a record or records be produced in a civil or criminal matter and has ordered that such records be released, or when the Board of Directors has determined that there is an appropriate basis upon which the privileged records should be released. SacRT's General Counsel is authorized to make every reasonable effort to protect the release of such records beyond the purpose of the civil or criminal case through the use of protective orders.

#### **1.1.5 Confidential Records**

Confidential records include documents whose disclosure would constitute an unwarranted invasion of personal privacy. Confidential records include personnel, medical, or similar files.

SacRT will only act as a stakeholder of confidential records provided by any third party and must be fully indemnified by the third party in any legal proceeding that challenges SacRT's right to retain records as confidential.

#### **1.1.6 Procurement/Trade Secret Records**

SacRT receives many different kinds of information and records from bidders and proposers through its various procurement related activities. These documents may include material that the bidder/proposer asserts to be a trade secret or a proprietary record of the bidder/proposer, which if released to a competitor or other third parties, may injure its ability to successfully compete in future contracting opportunities. These documents may contain a formula, plan, design, pattern, process, tool,

mechanism, compound, procedure, production data or software based application or process. Such documents may be withheld from disclosure if deemed to contain trade secrets or proprietary information and if the bidder/proposer agrees to indemnify SacRT to withhold its trade secret or proprietary information.

#### **1.1.7 Internal Negotiation Records**

SacRT is regularly involved in negotiations of many kinds. Negotiation positions are often put into written or electronic form and exchanged internally between staff, consultants, or legal counsel. Such internal negotiation records may not be disclosed to any third party as they may disclose SacRT's position on a particular negotiation or its method for conducting negotiations. It is in the public's best interest that SacRT be permitted to negotiate in private to achieve the best possible outcome.

#### **1.1.8 Computer Software Records**

Computer software, including but not limited to computer mapping systems, computer programs, and computer graphics systems, developed by and for SacRT are computer software records. These records are proprietary information of SacRT and may not be disclosed.

#### **1.1.9 Records Stored Offsite for Disaster Recovery**

SacRT may maintain a separate set of records in the event of a catastrophic event or disaster. These records are duplicates of official records that are stored in a secured offsite location for their protection. All SacRT disaster recovery records are not deemed public records and are not reviewable by any outside third parties for any reason.

### **C. RECORDS NOT ADDRESSED IN RECORD RETENTION SCHEDULE**

Records and other documents or materials that are not expressly addressed by the schedule may be destroyed at any time provided that they have been retained for the periods prescribed for substantially similar records.

### **D. STORAGE OF RECORDS**

Records may be stored in SacRT's office space or equipment if the records are in active use or are maintained in the office for convenience or ready reference. Examples of active files appropriately maintained in SacRT's office space or equipment include active chronological files, research and reference files, legislative drafting files, pending complaint files, administrative

files, and personnel files. Inactive records, for which use or reference has diminished sufficiently to permit removal from SacRT's office space or equipment, may be sent to SacRT's off-site storage facility or maintained in SacRT's storage facility.

#### **E. HISTORICAL RECORDS**

Records that are no longer of use to SacRT, but because of their age or research value, may be of historical interest or significance. Historical records may not be destroyed except in accordance with the procedures set forth in this Policy.

#### **F. LEGAL HOLD PENDING CLAIMS AND LITIGATION**

The retention periods set forth in the record retention schedule do not apply to materials that are otherwise eligible for destruction, but which may be relevant to a pending claim or litigation against SacRT. Once SacRT becomes aware of the existence of a claim against it and SacRT's General Counsel issues a Legal Hold, SacRT will retain all documents and other materials related to the claim until such time as the claim or subsequent litigation has been resolved. When SacRT has reason to believe that one or more SacRT departments have records relating to the claim or litigation, those departments will receive a Legal Hold notice from SacRT's General Counsel.

Audio or visual images captured by recording surveillance equipment are audio/visual surveillance records and are subject to release under the CPRA. These records include incidents occurring on SacRT bus or light rail vehicles, stations and facilities, and are considered incident evidence. Generally, under statute audio/visual records do not have to be retained as a permanent record. However, if the audio/visual recording has potential impact to a criminal investigation or pending or anticipated civil lawsuit, the audio/visual recording must be retained as instructed by the General Counsel and should only be destroyed upon notice from the General Counsel's Office that the recording is no longer needed and may be destroyed. In no event should such recording be destroyed sooner than 7 years from the date of recording.

#### **G. CONTRACT MANAGEMENT**

In accordance with SacRT's Procurement Policy Manual, Section 14.7, "a copy of all Invitations to Bid, Request for Proposals, Letter of Solicitation, and Requests for Qualifications which have been issued, all proposals and bids received in response to the solicitation, documentation of rejection of bids or proposals and/or any waiver of any minor irregularities, and the letter providing notice of the recommended award of the Contract must be maintained in SacRT files for public inspection for four years from the expiration or termination of the resulting contract." Additionally, SacRT must maintain all documents, reports, records, contracts and supporting materials relating to the contract for at least three years from the date of the final payment under a resulting contract.

## **H. RECORDS MANAGEMENT AT EMPLOYEE SEPARATION**

When employees separate from service, the department manager is responsible for ensuring that the employee's records are left in an orderly manner and maintained, transferred, and disposed of according to the retention schedule. Responsibility for any remaining active records should be transferred to the employee to whom the job duties of the departing employee are assigned or to the department manager.

## **VII. RESPONSIBILITIES**

### **A. DIVISIONS AND OTHER UNITS**

Employees in each division are directly responsible for the management of that division's records, documents, files, data, and other information pertaining to SacRT's official business. To fulfill this responsibility, each division must do the following:

- Ñ Identify and maintain the records for which it serves as the primary record-keeping division or department.
- Ñ Appoint a person or persons to serve in the capacity of Records Retention Coordinator, with overall responsibility for implementing the Records Retention Policy within their respective division or section.
- Ñ Ensure that each person within the division or section implements the Records Retention Schedule for all records and information within the scope of their responsibility.
- Ñ Conduct one or more Records Purge Days per year and dispose of all expired records, as required by the Records Retention and Destruction Schedule.

### **B. RECORDS RETENTION COORDINATORS**

Each department or division must have a Records Retention Coordinator. Records Retention Coordinators are responsible for implementing the records retention program within their respective division. These responsibilities include, but are not limited to:

- Ensuring full and complete implementation of the Records Retention and Destruction Schedule.
- Coordinating one or more Records Purge Days each year.
- Evaluating the effectiveness of the retention schedules, and proposing revisions to the Records Retention Schedule relating to the records within the scope of their responsibility.
- Working with the Clerk to the Board and SacRT's General Counsel to periodically update the Records Retention Schedule.
- Preventing the disposal of records or information following notification by SacRT General Counsel that a Legal Hold has been placed on the records.

### **C. OFFICE OF THE CLERK TO THE BOARD**

In addition to responsibilities under Section VII-B above, the Office of the Clerk to the Board is responsible for the following:

- Assisting with the development, maintenance and periodic review of the records retention program throughout SacRT. The program will consist of this Policy, the Records Retention Schedule and the records inventory.
- Coordinating the use of and offsite storage facilities for the storage and retrieval of records throughout SacRT.
- Maintaining a master inventory of records stored in off-site locations.

#### **D. SACRT GENERAL COUNSEL**

SacRT General Counsel is responsible for the following:

- Developing, maintaining and periodically reviewing the Records Retention Schedule.
- Advising divisions and employees, as appropriate, of actual or potential litigation, government investigations, or other circumstances that may affect records retention or disposal actions. For example, pre-trial discovery proceedings may prohibit destruction of all relevant records – including non-records, or records that should have been destroyed previously in accordance with the Records Retention Schedule.
- Issuing Legal Holds that formally suspend records disposal, specifying the types of records to which these suspensions relate, and removing these suspensions when appropriate.
- Providing legal advice to all divisions concerning all matters related to the legal aspects of the Records Retention Policy and Schedule.

### **VIII. PROCEDURES**

#### **A. ON-SITE STORAGE**

For the on-site storage time period specified in the Retention Schedule, records should be retained under the control of the staff person most likely to rely upon or require access to those records.

#### **B. OFF-SITE STORAGE**

For records to be stored off-site according to the record retention policy, staff in control of the records should prepare them for off-site storage. The records should be inventoried, boxed and clearly labeled, including a final disposal date or “retain indefinitely” designation. The Record Retention Coordinator for the relevant division is responsible for coordinating delivery to the off-site storage facility and will maintain a detailed and current inventory of all records stored off-site.

#### **C. RETRIEVAL FROM OFF-SITE STORAGE**

To retrieve a document stored off site, staff must submit a request to SacRT’s Facilities department for a record stored off-site. The request must include the appropriate corresponding box number.

#### **D. DESTRUCTION/DISPOSAL OF OFF-SITE DOCUMENTS**

Each Division will designate at least one day each year for the destruction and disposal of off-site records that have expired and will provide their



respective Executive Management Team (EMT) member with a comprehensive list of documents scheduled to be destroyed. The EMT member in each division should review the list and provide notice to the designated staff for any records whose retention date should be extended or made permanent. The notice must include a justification for the change and a new “dispose of” date or permanent retention designation.

#### **E. DISPOSAL OF ON-SITE DOCUMENTS**

At least once per year, each Division must dispose of expired on-site records. The designated Records Retention Coordinator will coordinate the effort. The annual date should coincide with the date established by each Division for the disposal of off-site records.

#### **F. EMAIL**

SacRT considers email as transitory communication and therefore the standard record retention schedule does not apply to email communications even if the email contains an otherwise covered record. However, where an email message constitutes a significant record, as in an affirmative act regarding a particular Board or agency activity, or approval or rejection of a contract or management decision, the email must be retained either in the departmental database or as a paper document in a project file in accordance with the retention schedule and this policy.